

DATE: January 5, 1999

DSL-BQA-98-067
CBRF-25

TO: Community Based Residential Facilities

FROM: Judy Fryback, Director
Bureau of Quality Assurance

TRAINING REQUIREMENTS AND TRAINING RELATED COMPLAINTS
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This memo provides further guidance and response to questions we have received regarding Community-Based Residential Facilities (CBRF) Training requirements.

MANAGEMENT AND ADMINISTRATION OF MEDICATIONS: At our most recent ETN, there were questions about the Medication training module and who is allowed to teach an approved CBRF Medication program. Please note the following:

1. The primary instructor for an approved CBRF Medication program must be either an RN or a Pharmacist.
2. Other staff may be approved as ancillary instructors, only under the following conditions:
 - All instructor's names are submitted to this Department with the initial application for review and approval of a training module. New instructors should be submitted to this Department for review on an ongoing basis, when they are added to a program
 - The primary instructor(s) (RN or Pharmacist) clearly spells out their role in supervising the approved program and the ancillary instructors, which includes:
 - a. A statement acknowledging their primary responsibility for the program
 - b. How they will ensure that the approved program will be taught as submitted
 - c. How they will ensure that questions that cannot be answered by the ancillary instructor are answered adequately and timely by the primary instructor(s)
 - d. How they will ensure that students are successfully completing the course
 - The primary instructor(s) must document their role in the ongoing supervision. This documentation shall be made available to the licensor during the survey.

Although HFS 83.14(3)(a) provides for medication administration training when not supervised by an RN or a Pharmacist and HFS 83.14(3)(b) provides for the training required when supervised by the RN or Pharmacist, both courses must be approved by the Department. At this time, the only training that has been approved is the eight-hour medication course. Any staff

person who assists in any portion of medication administration must take an eight-hour medication training program approved by the department prior to participating in medication administration.

FIRE SAFETY: The instructor qualifications for Fire Safety continue to be:

- Successful completion of the Fire Safety Train the Trainer course offered through the Wisconsin Technical College System, or
- Experience as a firefighter

At this time, the Department has not accepted any other credentials for instructors.

COMPLAINTS ABOUT TRAINING PROGRAMS: If the Department receives complaints regarding training, the complaints will be investigated. This might include allegations that courses are not being taught as approved, that there was no opportunity for interaction with the primary instructor if warranted during the course (e.g., Medication module), and complaints that the course was not the required length of time. If the allegations are substantiated, the approval for the course and/or the instructor(s) may be withdrawn. If warranted, HFS 83.14, training may be cited as a deficiency, as well as other sections of HFS 83.

APPROVED TRAINING PROGRAMS: The Department does not approve Train-the-Trainer courses. Some organizations offer these courses to better prepare staff to be trainers and these courses can be used as a credential when applying for approval for training. An application for approval for a training module must still be submitted to this department, and must include instructor qualifications.

Attached to this memo is the most recent list of approved programs. This list is also available on the Department's web site at

www.dhfs.state.wi.us